

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

STUDENT DOE NO. 1,
Plaintiff,

v.

KRISTI NOEM, *et al.*,
Defendants.

CIVIL ACTION NO: 25-1962

**PLAINTIFF'S MOTION FOR
TEMPORARY RESTRAINING ORDER**

Plaintiff, by and through undersigned counsel, hereby moves the Court pursuant to Rule 65 of the Federal Rules of Civil Procedure for a temporary restraining order enjoining the termination of his SEVIS registration and the consequent placing of Plaintiff out of lawful nonimmigrant F-1 Status. As set forth in the accompanying Memorandum of Law, Plaintiff has established a likelihood of success on the merits, Plaintiff will suffer irreparable harm if the TRO is denied, granting the TRO will not result in irreparable harm to Defendants, and granting the TRO is in the public interest.

WHEREFORE, Plaintiff respectfully requests that this Court grant this Motion for a Temporary Restraining Order and issue an order (i) enjoining Defendants from terminating Plaintiff's F-1 student status under the Student and

Exchange Visitor (SEVIS) system, and (ii) enjoining Defendants from directly or indirectly enforcing, implementing, or otherwise taking any action imposing any legal consequences as the result of the decision to terminate Plaintiff's SEVIS records.

Respectfully Submitted,

Dated: April 18, 2025

/s/ David S. Santee

David S. Santee
Pa. Bar. No. 83832
Law Offices of David S. Santee, LLC
12 Veterans Square, Suite 1
Media, PA 19063
Email: david@santeelawoffices.com
Telephone: (215) 717-8000
Facsimile: (215) 895-3995